

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JUAN ANTONIO HERNANDEZ ALVARADO,  
a/k/a “Tony Hernandez,”

Defendant.

DECLARATION

S2 15 Cr. 379 (PKC)

I, EMIL J. BOVE III, pursuant to Title 28, United States Code, Section 1746,  
declare under penalty of perjury:

1. I am an attorney admitted to the bar of the State of New York and the bar of this Court, and I am one of the Assistant United States Attorneys for the Southern District of New York responsible for this matter. I am submitting this Declaration in support of the Government’s May 28, 2019 opposition to the defendant’s May 11, 2019 pretrial motions (Dkt. Nos. 54-56).

2. Attached hereto as Exhibit A is a report of the Drug Enforcement Administration (“DEA”) related to the November 23, 2018 arrest of the defendant.

3. Attached hereto as Exhibit B are toll records from November 23, 2018 for the cellphone of DEA Special Agent Sandalio Gonzalez, which were obtained by the DEA from AT&T.

4. Attached hereto as Exhibit C is a Spanish-language advice-of-rights form, which was executed by the defendant following his arrest on November 23, 2018, and a corresponding translation of the form.

5. Attached hereto as Exhibit D is an email sent by Manuel Retureta to DEA Special Agent Stephen Fraga on November 23, 2018, at approximately 2:41 p.m.

6. Attached hereto as Exhibit E are two emails sent by Manuel Retureta to DEA Special Agent Sandalio Gonzalez beginning on November 23, 2018, at approximately 3:17 p.m.

7. Attached hereto as Exhibit F are emails exchanged between Manuel Retureta and AUSA Matthew Laroche beginning on November 23, 2018, at approximately 2:53 p.m.

8. Attached hereto as Exhibit G is an application for email header data, pursuant to Title 18, United States Code, Section 2703(d), which was filed on or about July 2, 2015 and produced to the defendant on or about March 19, 2019.

9. Attached hereto as Exhibit H is an application for email header data, pursuant to Title 18, United States Code, Section 2703(d), which was filed on or about December 12, 2018 and produced to the defendant on or about March 19, 2019.

10. Attached hereto as Exhibit I is an application for a search warrant, which was filed on or about December 11, 2018 and produced to the defendant on or about March 19, 2019.

11. Attached hereto as Exhibit J is a May 16, 2019 article from the *Washington Post*, titled “Honduran president’s brother admits to knowing drug lords.”

12. Attached hereto as Exhibit K is a May 15, 2019 article from the website *Insight Crime*, [www.insightcrime.org](http://www.insightcrime.org), titled “Testimony Brings Honduras President Closer to Brother’s Drug Trade Ties.”

I declare under penalty of perjury that, to the best of my knowledge, the foregoing information is true and correct.

Dated: New York, New York  
May 28, 2019

By: /s/  
Emil J. Bove III  
Assistant United States Attorney